



October 9, 2018

United States Environmental Protection Agency  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

Attention: Mr. Wesley Hardegree  
Environmental Engineer

Re: **Quarterly Progress Report #24 July-September 2018**  
**ERP Compliant Coke, LLC**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**  
Terracon Project No. E1127096

Dear Mr. Hardegree:

On behalf of ERP Compliant Coke, LLC (ERP Coke), Terracon Consultants, Inc. (Terracon) has prepared Quarterly Progress Report #24 for the work completed from July 1, 2018 to September 30, 2018 for the above-referenced site. This progress report has been prepared in accordance with paragraph 53 of the Order on Consent with effective date of August 1, 2016.

**PROGRESS REPORT (JULY 1, 2018 THROUGH SEPTEMBER 30, 2018)**

**Corrective Measures Implementation**

- n The *Corrective Measures Implementation (CMI) Work Plan's* for SMA 4 and SMA 5 were received interim approval from EPA in a letter dated July 27, 2018. The interim approval provided for the implementation of;
  - o LUCP development
  - o Environmental Covenant drafting
  - o Request for UIC Permit Application
  - o Activities related to horizontal well installation and sampling, and
  - o Corrective Action Groundwater Monitoring
- n EPA also provided several Comments on the CMI Work Plans for SMA 4 and SMA 5.
  - o The comments for CMI SMA 4 and SMA 5 were address in the CMI Work Plan (Revision 1.0) SMA 4 dated September 7, 2018, and the CMI Work Plan Addendum SMA 5 dated September 7, 2018 that were submitted to the EPA.

## Quarterly Progress Report #24 July-September 2018

ERP Coke ■ Birmingham, Alabama

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- The QAPP (Revision 1.2) was submitted to the EPA on August 30, 2018, and the SMA 4 Sampling and Analysis Plan was submitted to the EPA on September 28, 2018.
- The UIC Permit Application was submitted to ADEM on September 7, 2018.

### **Interim Measures**

- Hydraulic Control System was running during this reporting period. The volume of water recovered from July 1, 2018 through September 30, 2018 was 529,640 gallons.
- Groundwater level measurements and groundwater samples were collected from the monitoring wells in August 2018. These results will be reported to EPA in the next Annual Report which is due by August 30, 2019.

### **PROJECTED WORK FOR NEXT REPORTING PERIOD (OCTOBER 1, 2018 THROUGH DECEMBER 31, 2018)**

#### **Corrective Measures Implementation**

- We anticipate the following activities related to the approved CMI Work Plan to occur:
- LUCP prepared for SMA 4 and SMA 5.
- Draft Environmental Covenant submitted to EPA and then to ADEM after we receive EPA's comments.
- Comments and revisions to financial assurance for SMA 4 and SMA 5.

#### **Interim Measures/Remediating Monitoring**

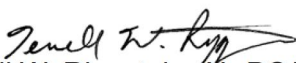
- Collect groundwater samples in November 2018.

### **CLOSING**

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,

**Terracon**

  
Terrell W. Rippstein, AL-PG#8  
Principal Geologist

Cc: Meredith Anderson – EPA Region 4  
Mr. Don Wiggins – ERP Coke  
ADEM